



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JAM/MEM/MG  
F. #2017R00509

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 16, 2024

By E-Mail and ECF

Mark DeMarco, Esq.  
*msdlaw@aol.com*

Michael O. Hueston, Esq.  
*mhueston@nyc.rr.com*

John A. Diaz, Esq.  
*johnadiazlaw@gmail.com*

Emilee A. Sahli  
*emilee@sahlilaw.com*

Susan G. Kellman, Esq.  
*sgk@kellmanesq.com*

Ezra Spilke, Esq.  
*ezra@spilkelaw.com*

Jacqueline E. Cistaro, Esq.  
*jec@cistarolawfirm.com*

Re: United States v. Karl Jordan, Jr., et al.  
Criminal Docket No. 20-CR-305 (S-2) (LDH)

Dear Counsel:

Please find uploaded to USAfx additional exhibits that the government may use in its case-in-chief during the upcoming trial in the above-referenced case.<sup>1</sup> The government will update the enclosed exhibit list if, as, and when it learns of additional and/or substitute exhibits.

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<sup>1</sup> Unless otherwise directed by the Court, the government expects to provide the exhibits, as well as 3500 material, to the Court on January 18, 2024—which is after the pretrial

The exhibits have been marked “Sensitive” per the parties’ agreement, memorialized by email on December 14, 2023, to treat all exhibits as “Sensitive” under the Protective Order issued on September 17, 2020 (ECF No. 22).<sup>2</sup>

The government continues to request exhibits from the defendants.

Very truly yours,

BREON PEACE  
United States Attorney

By:                     /s/                      
Artie McConnell  
Mark E. Misorek  
Miranda Gonzalez  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of the Court (LDH) (without enclosures)

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conference scheduled for January 17, 2024, but prior to the start of jury selection on January 22, 2024. See Individual Practice VII.C.

<sup>2</sup> Per the Protective Order, where defense counsel wish to attach any portion of the Sensitive material to public filings made with the Court, defense counsel “must provide advance notice to the government and make application to the Court for authorization to make such disclosure, and such notice must be given sufficiently in advance of the contemplated application so as to permit briefing and argument on the propriety of such disclosure.” ECF No. 22 ¶ 6 (emphasis added). This requirement also applies when defense counsel wish to “disclose any portion of” the Sensitive material, or “information derived from” the Sensitive material, in public filings made with the Court. Id. ¶ 5.